

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA

United States of America,	:	
	:	
v.	:	Docket Number 19-cr-134
	:	
Jermaine Clark,	:	Honorable Joy Flowers Conti
	:	United States District Judge
Defendant.	:	
	:	

UNOPPOSED MOTION TO CONTINUE PRE-TRIAL MOTIONS DEADLINE

Jermaine Clark, through counsel, moves to extend the April 17, 2020 deadline for filing pre-trial motions. Neither the government nor counsel for codefendant Terry Suggs opposes this motion.

1. On February 18, 2020, the parties in this matter filed a Joint Status Report asking this Court to extend the pre-trial motions deadline until April 17, 2020. ECF # 99.
2. On February 21, 2020, this Court granted that request, extending the deadline until April 17, 2020. ECF # 100.
3. On April 9, 2020, Mr. Clark filed a Motion to Compel Discovery. ECF # 107, 108. That motion seeks this Court's assistance in obtaining discovery essential to litigate pre-trial motions, including, most importantly, a motion to suppress. *See generally id.*

4. On April 13, 2020, this Court issued an order setting a Briefing Schedule on Mr. Clark's Motion to Compel, setting May 1, 2020 as the deadline for the government's response. ECF # 109.

5. The discovery sought by Mr. Clark is highly relevant to and possibly determinative of his to-be-filed motion to suppress and helpful to other potential pre-trial motions. Mr. Clark therefore submits it is in the interest judicial economy for this Court to resolve his Motion to Compel before Mr. Clark files any further pre-trial motions.

6. Accordingly, Mr. Clark moves to extend the pre-trial motions deadline from April 17, 2020 to thirty days after this Court's ruling on the Motion to Compel.

7. The government, through Assistant United States Attorney Rebecca Silinski, has indicated her consent to this request.

8. Counsel for Mr. Suggs have also indicated their consent to this request.
Respectfully Submitted,

/s/ Michael Wiseman

/s/ Jonathan Cioschi

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